UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Coast and Geodetic Survey
Silver Spring, Maryland 20910

Mr. William F. Caton
Acting Secretary, Federal
Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Caton:

The Aeronautical Charting Division (ACD) has prepared detailed comments pertaining to the Notice of Proposed Rule Making, WT Docket No. 95-5. They are included in the enclosure.

As you may know, our Aeronautical Charting Division has been tasked by the Federal Aviation Administration (FAA) to verify and maintain an obstacle database to support accurate and safe aeronautical charting products. At the present time, ACD believes that it's Digital Obstacle File (DOF) contains the only obstacle/antenna structure based archival record now in existence. As such, we welcome this proposal for the establishment of a structure registration system.

We look forward to the establishment of this new rule and think that the public interest will be served. If there are any questions that ACD could answer concerning our enclosed comments, please contact Ron Strathmann, Chief of the Aeronautical Data Unit, at 301-713-2819.

Enclosure

Sincerely,

Carol W. Beaver

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Chief, Aeronautical Charting
Division

Enclosure

Aeronautical Charting Division
Comments on WT Docket No. 95-5

- Section II, Part A, Paragraph 6, p. 4, speaks of a common database. It is unclear to ACD what exact elements will be in this database. Will it include all entries that are on the "Application For Antenna Structure Registration"? If not, would the registration forms be available through electronic imaging format or paper copy to ACD?

- Section II, Part A, Paragraph 11, p. 7, asks for comments on the initial filing window for the registration. ACD would recommend a combination of (b) and (c). While the height is the predominant factor for charting (i.e. (b) implementation by antenna structure height), ACD believes if a structure is up for renewal, the owner should not be burdened by any further processing when his structure height group is up for registration.

  ACD does not recommend option (c) implementation upon renewal, by itself. This option would take ten years before the registration process could be completed. ACD recommends this process be completed within five years.

- Section II, Part A, Paragraph 12, p. 8, states "This proposal would apply to all structures which require FAA notification." It is unclear to ACD what the definition of "structure" includes. For instance, does this include smoke stacks or power lines that are not being used for communication purposes?

  ACD agrees that each structure in an array should be given a registration number.

- Section II, Part A, Paragraph 16, p. 9-10, seeks comments on a variety of questions. Listed are comments for each:

  a) ACD would find this helpful. ACD is required to chart various types of lighting, regardless of whether FAA has required lighting.

  b) ACD would want to have on-line access.

  c) Until the use of electronic signatures are legal, ACD feels the signature may be needed to make the owner liable for the data that is submitted.

d) ACD believes a renewal process is necessary. Our recommendation is that the renewal period be no longer than every five years. This would insure all changes of owner, height, position, or antenna removal would be reported.

e) ACD does not recommend a registration fee. This might deter people from registering, which would not be in the interest of air safety.

f) This would be in the best interest of air safety.

g) No comment

h) No comment

i) An accuracy statement or estimate is needed for all structures. ACD recommends that all structures have at least a certified survey accurate to +/- 50 feet horizontal, and +/- 20 feet vertical. With the availability of the new GPS equipment and the concept of off-route flight, aircraft will need precise information on location and height of obstructions. ACD believes that a legal survey should be a requirement for registration. The location of an antenna structure is as important as correct lighting information.

- Section IV, part 21, paragraph 5, section 21.42, is unclear. ACD needs clarification on the notification to Federal Communications Commission (FCC) for height and position changes. ACD believes a one second change in geographical position and one meter change to height should always be reported.

- The following comments are on the "DRAFT Instructions for completion of FCC Form 854."

  Item 3 ACD would prefer both a street address and a description of its location.

  Item 9 Under a, b, c and 3), you refer to the Airport Directory. This information is no longer part of the Airman's Information Manual. This data is now carried in the Airport Facility Directory.

- The following are comments on the "DRAFT Application For Antenna Structure Registration."

  2. Under correction of coordinates, add a check box to determine if the previous coordinates were NAD 27 or NAD 83.

  3. Add a check box to determine if the coordinates came from a survey.

  4. The drawings are confusing. Use a drawing of a lattice tower.

  6. "Elevation of site" should read "Ground elevation of site." Add a check box to determine if this elevation was obtained by a survey.

  11. This number should be 10.

While ACD does recommend this registration process, it appears that the "Application For Antenna Structure Registration," is duplicating much of the FAA Form 7460. The owners would be best served if they only had one form to file for FAA and FCC. Under this system they still are required to fill out FAA Form 7460. ACD recommends that a form be created for joint use including all information needed by all three agencies, FAA, FCC, ACD.

Some consideration should be given to a single numbering system, used by FCC for registration and FAA for aeronautical studies. Perhaps, a numeric system for the registration and an alphabetic system to indicate when a change has been made (i.e. 1111, 1111a, 1111b, etc....) could be used. The structure itself would only be required to show the numeric.

The ACD Digital Obstacle File could be used to assist FCC with questionable entries within their current system. As the new database is being populated, an ongoing comparison of the ACD and FCC existing databases could help decrease the number of duplicate and inaccurate entries that now exist within both databases.